

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

STONE BANK)
)
)
Plaintiff,)
)
)
vs.) **Case No. 2:19-cv-02040-SHL-dkv**
)
)
CAH ACQUISITION COMPANY 11, LLC)
)
)
Defendant.)

DECLARATION OF GARY SHORB

STATE OF TENNESSEE)
)
COUNTY OF SHELBY)

I, Gary Shorb, being first duly sworn, state as follows:

1. I am an adult resident of Shelby County, Tennessee and am competent to make this Affidavit. The facts contained herein are of my own personal knowledge.
2. I am the Executive Director of the Urban Child Institute. My office is located at 1350 Concourse Way, Memphis Tennessee, 38104.
3. From October 2001 to December 2017 I was the CEO of the Methodist LeBonheur Healthcare System. The system is a 7 hospital, 13000 employee organization with revenue of \$1.8 billion.
4. I am familiar with the operation and management of critical access hospitals in Tennessee.

5. I understand that the Lauderdale Community Hospital is in default in payments to its creditors and has failed to pay for some of the services provided by its medical staff.

6. I understand that Stone Bank is seeking the appointment of Marianna Williams as receiver for the Lauderdale Community Hospital.

7. In order to help the court understand the complexity of this operation, it is a 24 bed rural hospital and while it is very important to the community it serves as a critical access hospital, it is not as complex to manage and operate as a multispecialty hospital in a metropolitan area. I believe this is something that a receiver with a consultant can understand and manage.

8. Because of the other boards I serve on and my present schedule, I am not available to testify at the hearing on January 29, 2019, but I am willing to make myself available to the court and the parties to answer any questions.

9. I am willing and able to provide assistance to Ms. Williams, at her request, with review and evaluation of the financial records and operations of Lauderdale Community Hospital, as well as advise Ms. Williams and make recommendations about the financial management and operation of the Lauderdale Community Hospital.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 29th day of January 2019 at Memphis, Tennessee.

s/Gary Shorb
GARY SHORB